

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

BOARD OF TRUSTEES OF THE
EMPLOYEE PAINTERS' TRUST; BOARD
OF TRUSTEES OF THE WESTERN
WASHINGTON PAINTERS DEFINED
CONTRIBUTION PENSION TRUST; BOARD
OF TRUSTEES OF THE DISTRICT
COUNCIL NO. 5 APPRENTICESHIP AND
TRAINING TRUST FUND; BOARD OF
TRUSTEES OF THE INTERNATIONAL
PAINTERS AND ALLIED TRADES
INDUSTRY PENSION FUND; BOARD OF
TRUSTEES OF THE FINISHING TRADES
INSTITUTE; BOARD OF TRUSTEES OF
THE PAINTERS AND ALLIED TRADES
LABOR MANAGEMENT COOPERATION
INITIATIVE; WESTERN WASHINGTON
SIGNATORY PAINTING EMPLOYERS
ASSOCIATION; and INTERNATIONAL
UNION OF PAINTERS AND ALLIED
TRADES DISTRICT COUNCIL NO. 5,

Plaintiffs,

v.

CHAMPION PAINTING SPECIALTY
SERVICES CORP, a Florida corporation;
CARLOS HERNANDEZ, an individual;
BERKSHIRE HATHAWAY SPECIALTY
INSURANCE COMPANY, a Nebraska

NO. 2:21-cv-00858-MJP

STIPULATION TO EXTEND TIME IN
WHICH TO ANSWER AND ORDER

NOTED ON MOTION CALENDAR:
November 2, 2012 (Local Rule 7(d)(1))

**STIPULATION TO EXTEND TIME IN WHICH TO ANSWER
AND ORDER – Page 1**

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corporation; OLD REPUBLIC SURETY COMPANY, a Wisconsin corporation; LIBERTY MUTUAL INSURANCE COMPANY, a Massachusetts corporation; WASHINGTON STATE DEPARTMENT OF TRANSPORTATION, a political subdivision of the State of Washington; ROGNLIN'S, INC., a Washington corporation; DOES & ROES I-X,

Defendants.

Plaintiffs by and through their counsel, Christensen James & Martin, and Defendant Old Republic Surety Company submit this Stipulation to Extend the Time Within Which to Answer.

The parties are attempting to resolve certain matters in which may narrow or eliminate issues to the pending litigation. Therefore, the parties agree that it would be appropriate to extend the time within which Defendant Old Republic Surety Company have to answer the Complaint through November 19, 2021.

This is the first request by the parties to extend the time for Defendant Old Republic Surety Company to answer the Complaint.

Dated: November 2, 2021

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CHRISTENSEN JAMES & MARTIN	WILLIAMS KASTNER & GIBBS
By: <u>/s/ Wesley J. Smtih</u> Wesley J. Smith, Esq. WSBA #51934 7440 W. Sahara Ave. Las Vegas, NV 98117 P. (702) 255-1718 wes@cjmlv.com Counsel for Plaintiffs	By: <u>/s/ Paul K. Friedrich</u> Paul K. Friedrich, Esq. WSBA #43080 601 Union Street, Suite 4100 Seattle, WA 98101 P. (206) 628-6600 pfriedrich@williamskastner.com Counsel for Defendant Old Republic Surety Company

1 **IT IS SO ORDERED**

2 Dated: November 2, 2021

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5 United States District Court Judge
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